

June 27, 2005

John M. Gisclon
EPRI Consultant, Test Program Lead
P. O. Box 1256
Ashland, OR 97520

Dear Mr. Gisclon,

Thank you for your letter of May 12, 2005, to Robert Tregoning on the subject "Industry Request for Information from Characterization of Materials Associated with Integrated Chemical Effects Test Runs 1 and 2." Your letter references the April 25, 2005, reply from the NRC (ADAMS ML051120294) to industry's initial request for information from the integrated chemical effects testing program (email dated March 24, 2005). Your May 12, 2005, letter raises concerns about previously requested information which was not provided in the April 25, 2005, response and identifies several new requests for information and materials. My staff has assessed each new request and item of concern. Your principal requests and concerns are enumerated below, followed by our response.

1. "Work is still in progress in several areas, and a comprehensive schedule for completion has not been determined or made available. NRR has mandated a schedule for industry to address the issues. Industry's ability to meet these mandates depends in part on when the research information is complete, available, and usable."

NRC response. The reporting schedule for the integrated chemical effects testing is provided as Attachment 1.

2. "Some information has been developed and has not yet been released to industry, such as run 2 suction collar scanning electron microscope (SEM) images."

NRC response. We have provided, and will continue to provide, information to industry as it is received by the NRC as indicated in the MOU. Generally, data will be released as per the project schedule. Additional high priority information can be released prior to the scheduled release date upon mutual agreement by the NRC, EPRI, and LANL project managers. In reaching agreement, consideration will be given to the impact on project schedules. Additionally, the QA process established for this project shall be followed prior to release of information.

3. "Your April 25 response identifies that some of the data we requested was '...not believed to be relevant to determining the impact of chemical by-products in actual sump environments.' ...We do not feel that it is consistent with the NRC-EPRI Memorandum of Understanding (MOU) to deny development or release of data and information (such as size and specific gravity for reaction products) based on currently perceived value or lack of value to issue resolution (e.g., head loss determination or transport). It should be left to the discretion of NRC or industry to decide at a later date which data are relevant to addressing the GSI-191 issue. ...MOU addendum clearly states ...that '*Chemical reaction product data and characterizationis to be obtained and included in the report.*'"

NRC response. The MOU does require characterization of chemical reaction products and includes examples of possible analyses, but it does not provide prescriptive requirements for specific characterizations. Therefore, the responsibility falls to the joint NRC/EPRI project managers to define which characterization studies will be performed, ensuring that the most important characterization studies are performed. If the project managers cannot reach agreement on the required characterization studies, then independent analyses are needed. Archival material from completed tests has been provided that the industry can use to conduct additional characterization studies that are not jointly agreed upon under the MOU.

4. "We have discussed release of ICET archival material to be used in industry testing, and requested confirmation of the availability of the material."

NRC Response. By letter dated May 19, 2005, from Michele Evans to John Gisclon, NRC authorized the transfer of custody of various amounts of archival material. (ADAMS ML05140044)

5. "On March 20, an email was sent to NRC providing information on the applicability of ICET results to ice condenser sodium tetraborate buffer plants. ...we understand that the staff may have issues regarding the material submitted. The WOG, on behalf of ice condenser licensees, requests a written response, documenting the issues industry will need to address by May 20, 2005."

NRC Response. Paul Klein (NRR/DE) provided an initial written response to the industry via email on May 12, 2005. A subsequent email on May 24, 2005, contained additional feedback along with the statement that "... the Staff considers testing an option for demonstrating the chemical equivalency of sodium tetraborate and sodium hydroxide in a PWR sump pool environment."

In addition to the items listed above, your May 12, 2005, letter contained a table entitled "Status of Responses to March 24, 2005 Request for Information and Analyses for Resolution of ICET Run 1 and 2 Issues." Consistent with the response to item #3 above, my staff will work with the LANL and EPRI project managers to identify additional analyses that would be of mutual interest and benefit and to establish appropriate schedules for resolution.

I believe this letter adequately responds to your May 12 letter. Please contact me or Rob Tregoning if you have additional requests.

Sincerely,

/RA/

Michele G. Evans, Chief
Engineering Research Application Branch
Division of Engineering Technology
Office of Nuclear Regulatory Research

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Attachment: Schedules for Reports of Integrated Chemical Effects Tests

DISTRIBUTION: DET r/f ERAB r/f

DOCUMENT NAME: E:\Filenet\ML051740081.wpd

OAR in ADAMS? (Y or N) Y ADAMS ACCESSION NO: **ML051740081** TEMPLATE NO. RES-006

Publicly Available? (Y or N) Y DATE OF RELEASE TO PUBLIC immediate 6/27 SENSITIVE? N

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*see previous concurrence

OFFICE	RES/DET/ERAB		RES/DET/ERAB		*NRR/DE/EMCB		*NRR/DE/EMCB	
NAME	A. Ramey-Smith /RT for/		R. Tregoning /RA/		L. Lund /RA/		W. Bateman /AM for/	
DATE	6/27/05		6/27/05		6/23/05		6/23/05	
OFFICE	RES/DET/ERAB				SISP Review		SISP Review	
NAME	M. Evans				A. Ramey-Smith/RT for/		M. Evans /RA/	
DATE	6/27/05				6/27/05		6/27/05	

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Schedules for Reports of Integrated Chemical Effects Tests
at the University of New Mexico

Report	Availability ¹
ICET test #1 final data report	June 30, 2005
ICET test #1 implications summary (NRC)	June 30, 2005
ICET test #2 implications summary (NRC)	June 30, 2005
ICET test #2 draft data report for review ²	July 7, 2005
ICET test #2 final data report	August 9, 2005
ICET test #3 implications summary (NRC)	June 30, 2005
ICET test #3 draft data report for review	August 9, 2005
ICET test #3 final data report	September 6, 2005
ICET test #4 implications summary (NRC)	July 22, 2005
ICET test #4 draft data report for review	September 8, 2005
ICET test #4 final data report	October 6, 2005
ICET test #5 implications summary (NRC)	September 12, 2005
ICET test #5 draft data report for review	October 25, 2005
ICET test #5 final data report	November 29, 2005

Attachment 1

¹Dates are approximate within one week.

²A ten-day review period is planned for each draft data report.